

1 UNITED STATES DISTRICT COURT
2 FOR THE MIDDLE DISTRICT OF TENNESSEE
3 NASHVILLE DIVISION

4 KAYLA GORE; JAIME COMBS;
5 L.G.; and K.N.,
6
7 Plaintiffs,

8 vs. Case No. 3:19-0328

9 WILLIAM BYRON LEE, in his
10 official capacity as Governor
11 of the State of Tennessee;
12 and LISA PIERCEY, in her official
13 capacity as Commissioner of the
14 Tennessee Department of Health,
15 Defendants.

16 Videoconference Deposition of:

17 L.G.

18 Taken on behalf of the Defendants
19 April 17, 2020

20
21
22
23 Elite Reporting Services
24 www.elitereportingservices.com
25 Jeannie Chaffin, LCR, Associate Reporter
Post Office Box 292382
Nashville, Tennessee 37229
(615)595-0073

Does your family know that -- does your family know of your status as a transgender woman?

MR. ROESSLER: Objection.

THE WITNESS: I'm not sure how to answer that.

BY MR. LIM:

Q. Do your parents know?

A. My mother knows that I'm a trans woman. And my father passed away [REDACTED]

Q. I'm sorry to hear that.

Do your siblings know?

A. Yes.

Q. Do your colleagues know?

MR. ROESSLER: Objection.

THE WITNESS: What -- what colleagues are you referring to?

BY MR. LIM:

Q. The previous colleagues at [REDACTED]

[REDACTED].

A. [REDACTED]

Q. Yes.

A. I'm not sure if I can speculate on knowledge that people possess.

Q. Did you tell anyone -- tell any of your

co-workers about your status as a trans woman?

A. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Q. When did you come out to her?

A. That was around August of 2016, I believe.

Q. Was that at your school, where you are attending school now?

MR. ROESSLER: Objection.

THE WITNESS: I'm sorry, could you repeat that?

BY MR. LIM:

Q. Have you told anyone at your current school, where you're obtaining your master's, of your status as a transgender woman?

A. Yes.

Q. Who are they?

A. I have informed some of my classmates and my immediate cohorts, the professors that I have had, and the director of admissions.

Q. Okay. Thank you.

When did you first identify yourself as a transgender woman?

MR. ROESSLER: Objection.

1	Ms. LG, do you need a break?	01:36:37
2	A. I think I can continue for a little while.	01:36:43
3	Q. Okay. Ms. LG, I'd like to bring your	01:36:46
4	attention to paragraph 137, where you say that you	01:36:56
5	reasonably fear that possessing a birth certificate	01:37:04
6	that fails to reflect your female gender marker	01:37:08
7	increases the likelihood that you would be subject to	01:37:18
8	invasions of privacy, prejudice, discrimination,	01:37:23
9	distress, harassment, and violence. But the	01:37:27
10	instances that you just mentioned didn't involve the	01:37:36
11	birth certificate in any way, no?	01:37:39
12	MR. ROESSLER: Objection.	01:37:44
13	THE WITNESS: When I presented my birth	01:37:51
14	certificate along with all of my documentation and	01:37:54
15	tried to use the documentation to change the gender	01:38:00
16	marker on my driver's license, it was denied. There	01:38:03
17	were other -- there were other experiences -- similar	01:38:16
18	experiences at other DMVs. And there were	01:38:25
19	experiences dealing with law enforcement and medical	01:38:27
20	providers.	01:38:31
21	BY MR. LIM:	01:38:39
22	Q. Do you carry your birth certificate with you?	01:38:39
23	A. I keep my birth certificate locked in a	01:38:46
24	safety deposit box. And it's sealed in an envelope	01:38:51
25	so that no one will ever see it. And my mom is the	01:38:58